

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

HERB CHAMBERS OF AUBURN, INC.
d/b/a HERB CHAMBERS HYUNDAI OF
AUBURN,

Plaintiff/Counter-Defendant,

v.

HYUNDAI MOTOR AMERICA, INC.,

Defendant/Counter-Plaintiff.

4:24-cv-40065-MRG

STIPULATION OF DISMISSAL WITH PREJUDICE

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff/Counterclaim-Defendant Herb Chambers of Auburn, Inc. d/b/a Herb Chambers Hyundai of Auburn and Defendant/Counterclaim-Plaintiff Hyundai Motor America, Inc., through their respective undersigned counsel, that the above-captioned action is voluntarily dismissed, with prejudice, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), with each party to bear their own costs and attorneys' fees.

Dated: August 19, 2025.

[Signature block on following page]

Jointly submitted:

/s/ Rachel A. Sternlieb

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CERTIFICATE OF SERVICE

I hereby certify that on August 19, 2025, a true and correct copy of the foregoing document was filed via PACER which caused it to be served on all counsel of record.

/s/ Ian Pinta

Ian J. Pinta